

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

RECEIVED

2005 NOV -8 A 10: 20

SHAWN REAVES on behalf of  
him and others similarly situated,

Plaintiff,

vs.

WILDCAT INVESTMENTS, LLC,  
AND B&B FOODS, L.L.C.

Defendants.

Case No.: 3:05-CV-900-DRB

LEON P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA.

---

**DEFENDANTS' MOTION FOR LEAVE TO FILE APPEARANCE, *PRO HAC VICE***

---

Defendants, **WILDCAT INVESTMENTS, LLC and B&B FOODS, L.L.C.**, by and through their attorneys Gregory H. Andrews, Isham R. Jones, III and Kerry Lin Davidson of **ANDREWS KOEHLER & PASSARELLI, P.C.**, hereby move this Honorable Court to grant their Motion For Leave To File their Appearance, *Pro Hac Vice*. In support of their Motion, Defendants state as follows:

1. Defendants have retained Gregory H. Andrews, Isham R. Jones, III and Kerry Lin Davidson of the law firm of Andrews Koehler & Passarelli, P.C. to represent them in the above-referenced action brought by Plaintiff. Attorneys Andrews, Jones and Davidson are labor and employment lawyers and seek to file an Appearance, *Pro Hac Vice*, on behalf of the Defendants in the above-referenced matter.

2. Rule 83.1 (b) of the Local Rules of United States District Court for the Middle District of Alabama states in pertinent part:

Appearance Pro Hac Vice. Any attorney who is not a member of the Bar of this Court but who is admitted to practice before the United States District Court for the district in which such person resides or regularly

practices law, may, upon request, be admitted pro hac vice by an order of any district judge, magistrate judge, or bankruptcy judge of this Court.

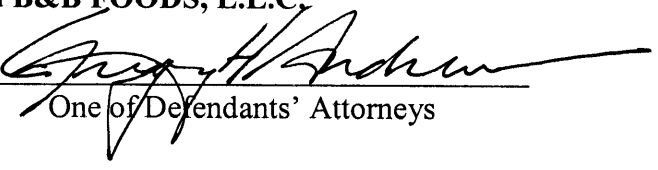
3. Although Attorneys Andrews, Jones and Davidson are not members of the Bar of the United States District Court for the Middle District of Alabama, all are members in good standing in the Bar of the United States District Court of the Northern District of Illinois and are not under suspension or subject to any discipline with respect to their law practice before that court or any other federal or state court. See Certificates of Good Standing, attached hereto as Exhibit 1.

3. Furthermore, Attorneys Andrews, Jones and Davidson only seek to represent Defendants in the above-referenced action brought by Plaintiff and pending in this Court and are not currently appearing on a *pro hac vice* basis in any other matter in any court located in the State of Alabama.

WHEREFORE, Defendants respectfully requests that this Court grant their Motion For Leave To File their Appearance, *Pro Hac Vice*, and further grant them any other relief that this Court deems is just and equitable.

Respectfully submitted this 7<sup>th</sup> day of November, 2005.

**WILDCAT INVESTMENTS, LLC,  
and B&B FOODS, L.L.C.**

By:   
One of Defendants' Attorneys

Gregory H. Andrews (ILARDC 6209480)  
Isham R. Jones, III (ILARDC 6243202)  
Kerry Lin Davidson (ILARDC 6277341)  
ANDREWS KOEHLER & PASSARELLI, P.C.  
4343 Commerce Court, Suite 615  
Lisle, Illinois 60532  
Telephone: (630) 505-9939  
Facsimile: (630) 505-9969

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he served a true and correct copy of **DEFENDANTS' MOTION FOR LEAVE TO FILE APPEARANCE, *PRO HAC VICE*** upon the below-noticed individual(s) via U.S. Mail, first class postage prepaid on this 7<sup>th</sup> day of November, 2005.

Jon C. Goldfarb (GOL015)  
Maury S. Weiner (WEI021)  
Kell Simon (SIM061)  
Wiggins, Childs, Quinn & Pantazis, LLC  
The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, Alabama 35203

  
Gregory H. Andrews